

James Johnson

1. Describe any such communication sought to be protected, including its subject matter; and
2. Identify the individual by whom it was made, the individual to whom it was directed, and all individuals present when it was made; and
3. Identify any document in which it was recorded, described or summarized; and
4. Identify any such document sought to be protected.

INTERROGATORIES¹

1) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Taylor racially discriminated against you:

- (a) Identify all facts that refute, relate to, or support your contention;
- (b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;
- (c) Identify all persons with knowledge of such contention or facts;
- (d) Identify all documents that reflect, refer to or relate to such contention or

facts.

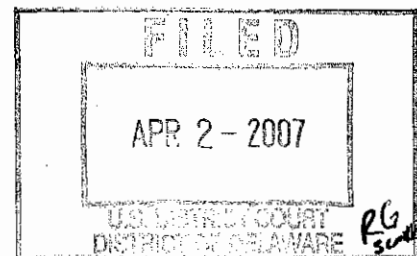
RESPONSE:

*I Agree To All The Allegation of the
equal protection claims*

2) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Kearney racially discriminated against you:

- (a) Identify all facts that refute, relate to, or support your contention;

¹ Please submit additional pages, if necessary.



(b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;

(c) Identify all persons with knowledge of such contention or facts;

(d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE: I wrote letters to Rick Kearney in reference to racial discrimination, to classification, other inmates have written similar complain which went unanswered by Rick Kearney

3) Identify (a) every communication you have had with anyone, other than your attorney, concerning this litigation including but not limited to memoranda, journals, diaries, letters, or petitions that you have written; (b) any person with knowledge of such communication(s); and (c) all documents supporting, evidencing, referring or relating to those communications.

RESPONSE: I wrote D.O.C Internal Affairs, Warden Counselor Donna Furman, LT CABE, Counselor Jerry Burga

4) Identify all documents which you intend to offer into evidence at the trial of this matter.

RESPONSE: Documents provided through discovery will be available. Further discovery is needed.

5) Identify all persons having knowledge of the allegations in the complaint or answer whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE: *AT This Time there Are No Expert witnesses*

Donna Furman

CPL V. Watson

C/O A Hopkins

C/O Perdue

Jamete George Jackson

6) Identify any physical evidence which relates in any way to any of the facts alleged in the complaint or answer, or which you intend to offer in evidence at trial.

RESPONSE:

None

7) Identify each expert you expect to call to testify as a witness at trial and state for each such expert (a) the qualifications of the expert; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; and (d) the summary of the grounds for such opinion.

RESPONSE:

No Expert Needed

8) State the following about yourself:

a. Full name, and any other names you have gone by or used,

James Johnson

- 222 50-5121
- b. Social Security Number
 - c. Date of birth, and any other date of birth you may have used or given, 1-13-59
 - d. Place of birth Wilton, Dela.
 - e. Highest level of formal education that you successfully completed. 12th

RESPONSE:

9) Identify all of your criminal convictions in the past 15 years, including the court, jurisdiction, date of conviction, date of sentencing, and the terms of the sentence.

RESPONSE: Objection

This Request has NO RELEVANCE ~~to the~~ ~~case~~ ~~and~~ ~~is~~ ~~irrelevant~~
To Plaintiff Claim

Rule 26

10) Identify all employment you have had in the past 15 years, including employment you have had while incarcerated, and state for each position (a) the name and address of each employer; (b) name of supervisor; (c) dates of employment; (d) rate of pay; (e) job title and responsibilities; and (f) reason for termination.

RESPONSE:

Kitchen Worker \$40 A month
Laundry Worker 25.20 A month

11) Identify all programs you have completed during your periods of incarceration over the last fifteen years, and state for each program (a) the name of the program; (b) the purpose of the program; (c) the time period during which you participated in the program; and (d) whether you successfully completed the program.

RESPONSE: Objection. This Request has NO Relevance
To Plaintiff Claim Rule
26

12) Identify all physicians you have seen or been treated by in the past 10 years, including name, office address, telephone number, dates of examination or treatment, and the medical problem involved, if any.

RESPONSE: Objection. This Request has NO Relevance
To Plaintiff Claim Rule 26

13) Identify and describe all accidents, injuries and ailments you have had in the past 15 years, including the history of any mental illness.

RESPONSE: Objection. This Request has NO Relevance
To Plaintiff Claim Rule
26

14) Identify in detail the precise injury or harm you allege was sustained as a result of the allegations in the Complaint.

Mental Anguish

RESPONSE:

15) Describe any medical treatment you received as a result of the allegations in the Complaint, specifically addressing:

a. whether you requested any medical treatment at any DOC facility which you believe in any way resulted from the allegations in your complaint; and

b. the date and method used for any request listed in subparagraph a. of this interrogatory.

RESPONSE: No Medical Treatment.

16) State whether you filed a complaint or grievance at the correctional institution or with the Department of Correction about the subject matter of each and every claim in your Complaint. If so, when were they filed, with who were they filed, and what was the response? If none were filed, explain why.

RESPONSE: None Agrievable

17) State whether you have ever received any diagnostic testing in relation to any

diagnosed medical condition, including but not limited to any mental, emotional, psychiatric, or psychological condition. If your answer is yes, please state the requesting medical doctor, the type of testing, as well as the date and location of said testing.

RESPONSE: *Objection.*

*This Request has no relevance
To Plaintiff claim
Rule 26*

18) State the total amount of compensatory damages you are claiming and the computation used to arrive at the sum.

RESPONSE: *Refer - To Complaint*

19) Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state:

- a. The name and last known address of each such person; and
- b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE:

*None AT this Time, Will Supplemental
Response.*

20) Identify all persons who provided information for all or any part of your answers to these Interrogatory Requests and the Request for Production filed contemporaneously herewith and, for each person named, identify the request as to which each such person provided information.

RESPONSE:

**DEPARTMENT OF JUSTICE
STATE OF DELAWARE**

~~/s/ Stacey Xarhoulakos~~
~~Stacey Xarhoulakos (I.D. 4667)~~
~~Deputy Attorney General~~
~~Department of Justice~~
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~~stacey.xarhoulakos@state.de.us~~
~~Attorney for Defendants~~

~~Dated: March 9, 2007~~

3-29-07
Date

Jamie Johnson

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